

INTERVENTION



0000130356

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

ORIGINAL

2011 OCT - 7 A 9:34

Arizona Corporation Commission

DOCKETED

GARY PIERCE – Chairman

BOB STUMP

SANDRA D. KENNEDY

PAUL NEWMAN

BRENDA BURNS

AZ CORP COMMISSION
DOCKET CONTROL

OCT 7 2011

DOCKETED BY

[Signature]

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR A
HEARING TO DETERMINE THE FAIR VALUE OF
THE UTILITY PROPERTY OF THE COMPANY
FOR RATEMAKING PURPOSES, TO FIX A JUST
AND REASONABLE RATE OF RETURN
THEREON, TO APPROVE RATE SCHEDULES
DESIGNED TO DEVELOP SUCH RETURN.

Docket No. E-01345A-11-0224

**MOTION FOR LEAVE TO
INTERVENE OF NATURAL
RESOURCES DEFENSE COUNSEL**

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission
("Commission"), Natural Resources Defense Council ("NRDC") hereby moves for leave to intervene
in the above-captioned docket based on the following grounds:

1. NRDC is a non-profit national environmental organization that combines the grassroots power
of 1.3 million members and online activists with the expertise of more than 350 lawyers, scientists
and other professionals. NRDC uses law, science, and grassroots support to protect the planet's
wildlife and wild places and to ensure a safe and healthy environment for all living things. NRDC
tackles state-based, national and international issues through our offices in New York, San Francisco,
Santa Monica, Washington D.C., Chicago and Beijing.

2. As of October 2010, NRDC had more than 11,000 members and 18,000 online activists in
Arizona. These NRDC members and supporters live in Arizona and have an interest in increased
development of energy efficiency programs and related incentives and disincentives to maximizing

1 energy efficiency. Thus, NRDC has a substantial interest in this proceeding because Arizona Public
2 Service Company's proposal significantly impacts energy efficiency.

3 3. Intervention by NRDC will not unduly broaden the issues or delay this proceeding.

4 4. NRDC requests that all pleadings, correspondence, discovery and other documents be served
5 on the following:
6

7 Laura E. Sanchez
8 NRDC
9 P.O. Box 287
10 Albuquerque, NM 87103
(505) 352-7408 (Tel/Fax)
lsanchez@nrdc.org

11 Deliveries requiring a street address should be sent to:

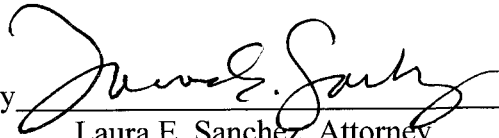
12 Laura E. Sanchez
13 NRDC
14 5736 Valle Alegre NW
Albuquerque, NM 87120

15 5. NRDC's counsel above is pending bar admission in Arizona, and will separately file a Motion
16 to Associate Counsel Pro Hac Vice through local counsel, to request admission as counsel for NRDC
17 in this matter.

18 WHEREFORE, NRDC respectfully requests that the Commission issue an order granting its
19 Motion for Leave to Intervene in the above-captioned proceeding.
20

21 RESPECTFULLY SUBMITTED this 4th day of October, 2011.

22 NATURAL RESOURCES
23 DEFENSE COUNCIL

24 By 
25 Laura E. Sanchez, Attorney
26 P.O. Box 287
27 Albuquerque, NM 87103
28

1 ORIGINAL and 14 COPIES of the
2 foregoing filed this 4th day of
3 October, 2011 to:

4 Docketing Supervisor
5 Docket Control
6 Arizona Corporation Commission
7 1200 W. Washington
8 Phoenix, AZ 85007

9 COPIES of the foregoing mailed
10 this 4th day of October, 2011 to:

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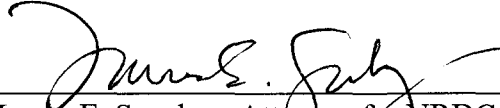
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